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WRITER'S DIRECT DIAL

(703) 584-8665

March 23, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **Supplement to E911 Phase II Implementation Plan
Bluegrass Cellular**

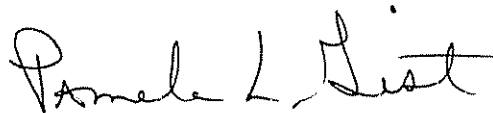
CC Docket 94-102

Dear Ms. Dortch:

On behalf of Bluegrass Cellular and pursuant to Section 20.18(i) of the Commission's Rules, submitted herewith is a narrative statement regarding the companies' E911 Phase II implementation plans.

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,



Pamela L. Gist

BLUEGRASS CELLULAR

Supplemental E-911 Phase II Implementation Plan Report

Pursuant to the Commission's wireless enhanced E911 rules, this document serves as a supplemental report on Implementation Plans of Wireless E911 Phase II Automatic Location Identification for the affiliated companies of Bluegrass Cellular.

Bluegrass Cellular operates wireless networks in primarily rural communities in the state of Kentucky, with plans to expand service into areas of Indiana. Bluegrass Cellular's network technology includes TDMA/analog and CDMA networks. This report will supplement the Commission's record with Bluegrass Cellular's election for providing Phase II Enhanced 911 services in areas in the states of Kentucky and Indiana where Bluegrass Cellular utilizes or will utilize CDMA technology.

Background/Contact Information

(1) Carrier Identifying Information

<u>Legal Carrier Name</u>	<u>TRS/Filer Identification Number</u>
Kentucky RSA 3 Cellular General Partnership	802 2181
Kentucky RSA 4 Cellular General Partnership	802 2151
Cumberland Cellular Partnership	802 2211
Bluegrass Wireless LLC	Applied for
Address: P.O. Box 5012 2902 Ring Road Elizabethtown Kentucky 42702-5012	

(2) Contact Information

Scott McCloud, Operations Manager
Bluegrass Cellular
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2902 Ring Road
Elizabethtown
Kentucky 42702-5012
Telephone: (270) 769-0339 ext. 119
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E-Mail: smccloud@blue.net

E911 Phase II Location Technology Information for CDMA

(1) Type of Technology

Bluegrass Cellular has begun to deploy CDMA technology in parts of its wireless service area in Kentucky, and will deploy CDMA in new service areas in Indiana. Bluegrass Cellular has concluded that handset-based technology is the appropriate means for delivery of E911 Phase II services to users of digital handsets on the CDMA network. Bluegrass Cellular will continue to deploy a network-based solution on its TDMA/analog systems, due to the unavailability of ALI-capable handsets compatible with those facilities. In areas where Bluegrass Cellular has or will deploy CDMA technology, it is prospectively advantageous for customers with ALI-capable handsets to have the benefit of the superior location accuracy afforded by digital handsets, rather than to rely purely upon the location accuracy that is achievable using a network-based solution in rural areas.

(2) Testing and Verification

Bluegrass Cellular has reviewed and evaluated the test results and accompanying technical information provided by providers of ALI-capable handsets. Bluegrass Cellular will adopt its own empirical testing and verification methods and procedures based on sound engineering and statistical practices, referring to the principles and standards set forth in OET Bulletin 71. This testing and verification will likely be incorporated into routine testing by company technicians of the handset-based solution in the areas of CDMA deployment.

(3) Implementation Details and Schedule

- In areas where Bluegrass Cellular's CDMA overlay has been implemented, 100% of all new CDMA digital handsets are ALI-capable. Handset vendors have been able to

supply in sufficient quantity digital phones with Phase II automatic location information ("ALI") capabilities.

- Bluegrass Cellular will notify the FCC of any change in its handset-based Phase II implementation. In maintaining the network-based Phase II facilities already deployed, Bluegrass Cellular recognizes that the Commission's rules require the deployment of a Phase II system, even if none exists which fully meets the Commission's accuracy requirements.

(4) PSAP Interface

Bluegrass Cellular works with each PSAP to mutually determine the best method of delivering Phase II information to that PSAP, particularly with the deployment of Bluegrass Cellular's network-based technology. Bluegrass Cellular continues to deploy the necessary hardware and software changes to timely deliver the Phase II information after receipt of a valid Phase II request. Where appropriate, Bluegrass Cellular works with PSAPs to convert the PSAP interface to non-call path associated signaling ("NCAS") to accommodate the increased messaging requirements resulting from implementation of E911 capabilities.

(5) Existing Handsets

Bluegrass Cellular's handset-based solution, where implemented, will create a Phase II capability that will provide enhanced ALI information from the commencement of implementation.

(6) Location of Non-Compatible Handsets

Bluegrass Cellular will employ a handset-based solution in its CDMA service areas in Kentucky and Indiana in a manner that will ensure that E911 calls placed on handsets that are not compatible with handset-based solution will be delivered to the PSAP with E911 Phase II information. At a minimum, for the time being, non-subscribers to Bluegrass Cellular's service with non-ALI-capable handsets roaming into a Bluegrass Cellular's service area will receive Phase I capabilities within PSAP areas that are Phase I capable, and will receive network-based Phase II capabilities within PSAP areas that are Phase II capable.

(7) Other Information

Bluegrass Cellular remains dedicated to timely implementation of E911 Phase II ALI capabilities that comply with the Commission's accuracy requirements to the greatest degree technically possible. While Bluegrass Cellular cannot control equipment availability, vendors' delivery schedules, LEC delays or PSAP capability, Bluegrass Cellular will continue to work diligently to implement a handset-based E911 Phase II solution for its CDMA network in Kentucky and Indiana, and to extend the network-based E911 Phase II solution for its TDMA/analog network.